THE HONORABLE JAMAL N. WHITEHEAD 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON SEATTLE DIVISION 9 CORLIS VERNON, individually and on behalf Case No. 2:23-cv-01180-JNW 10 of all others similarly situated, 11 STIPULATED MOTION FOR **EXTENSION OF TIME** Plaintiff, 12 NOTE FOR MOTION CALENDAR: v. 13 November 21, 2023 CLOSETS BY DESIGN, INC. and CBD 14 FRANCHISING, INC., 15 Defendants. 16 17 18 STIPULATED MOTION 19 Pursuant to LCR 7(d)(1) and LCR (10)(g), Plaintiff Corlis Vernon ("Plaintiff") and Defendants 20 Closets by Design, Inc. and CBD Franchising, Inc. ("Defendants"), hereby submit this stipulated 21 motion to extend the deadline for Plaintiff to respond to Defendants' Motion to Dismiss (Dkt. 27) and 22 for Defendants to reply in support of their motion. In support of this motion, the parties state as 23 follows: 24 1. Plaintiff filed her First Amended Complaint in this Court on October 13, 2023. 25 Defendants filed their Motion to Dismiss for Lack of Personal Jurisdiction on 2.. 26 November 15, 2023. 27 According to LCR 7(d)(3), Plaintiff's current deadline to respond to Defendants' Motion 3. Dovel & Luner, LLP STIPULATED MOTION TO EXTEND TIME Case No. 2:23-cv-01180-JNW 1

201 Santa Monica Blvd., Suite 600 Santa Monica, CA 90401 (310) 656-7066

1	to Dismiss is December 4, 2023, and Defendants' deadline to reply in support of its motion is		
2	December 8, 2023.		
3	4.	The parties have stipulated an	d agreed to extend Plaintiff's and Defendants' deadlines to
4	December 18, 2023, and January 5, 2024, respectively.		
5	5.	The parties' request the extens	sions due to the intervening November and December
6	holidays, as well as pre-existing deadlines in counsel's other cases. The requested extensions are for		
7	good cause and are not meant to improperly delay this proceeding.		
8	6.	This is the parties' first reques	et for an extension of time regarding Defendants' Motion
9	to Dismiss the First Amended Complaint.		
10	7.	This change in deadlines will r	not alter the date of any event or any deadline already fixed
11	by Court order, local rules, or the Federal Rules of Civil Procedure.		
12	WHEREFORE, the parties hereby agree and move the Court to grant Plaintiff an extension of		
13	time to file and serve her response to the Defendants' Motion to Dismiss to December 18, 2023, and		
14	for Defendants to file and serve their reply on January 5, 2024.		
15			
16	Dated: Nove	mber 21, 2023	Respectfully submitted,
17			By: s/ Simon Franzini
18			Simon C. Franzini (Cal. Bar No. 287631)* simon@dovel.com
19			DOVEL & LUNER, LLP 201 Santa Monica Blvd., Suite 600
20			Santa Monica, California 90401 Telephone: (310) 656-7066
21			Facsimile: (310) 656-7069
22			Wright A. Noel, WSBA No. 25264
23			Carson & Noel, PLLC 20 Sixth Ave. NE
24			Issaquah WA 98027Tel: 425-395-7786 Fax: 425-837-5396
25			Email: wright@carsonnoel.com
26			Counsel for Plaintiff
27			

Case 2:23-cv-01180-JNW Document 32 Filed 11/22/23 Page 3 of 4

By: s/ Duncan McCreary 1 REEDER MCCREARY, LLP Duncan McCreary * 2 Christopher S. Reeder * 11766 Wilshire Blvd., Suite 1470 3 Los Angeles, CA 90025 Telephone: 310-861-2470 4 duncan@reedermccreary.com 5 chris@reedermccreary.com 6 Zachary E. Davison, WSBA No. 47873 Byron C. Starkey, WSBA No. 55545 7 Perkins Coie LLP 1201 Third Avenue, Suite 4900 8 Seattle, Washington 98101-3099 9 Telephone: +1.206.359.8000 Facsimile: +1.206.359.9000 10 ZDavison@perkinscoie.com ByronStarkey@perkinscoie.com 11 Counsel for Defendants 12 *Admitted Pro Hac Vice 13 14 **ORDER** 15 As described by the above Stipulated Motion, IT IS SO ORDERED. 16 Plaintiff shall file and serve her response to Defendants' Motion to Dismiss no later than 17 December 18, 2023, and Defendants shall file and serve their reply no later than January 5, 2024. 18 19 Dated on this 22nd day of November, 2023. 20 21 22 Janal W 23 24 Jamal N. Whitehead United States District Judge 25 26 27

Case 2:23-cv-01180-JNW Document 32 Filed 11/22/23 Page 4 of 4

1	Presented by:
2	s/ Simon Franzini
2	Simon C. Franzini (Cal. Bar No. 287631)*
3	simon@dovel.com DOVEL & LUNER, LLP
4	201 Santa Monica Blvd., Suite 600
	Santa Monica, California 90401
5	Telephone: (310) 656-7066 Facsimile: (310) 656-7069
6	Paesinine. (310) 030-7009
7	Wright A. Noel, WSBA No. 25264
	Carson & Noel, PLLC 20 Sixth Ave. NE
8	Issaquah WA 98027'Tel: 425-395-7786
9	Fax: 425-837-5396
10	Email: wright@carsonnoel.com
11	Counsel for Plaintiff
12	*Admitted <i>Pro Hac Vice</i>
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	